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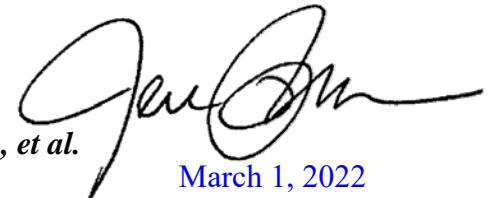
March 1, 2022

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 172.

VIA ECF

Honorable Jesse M. Furman, U.S.D.J.
United States District Court
40 Foley Square
New York, NY 10007

SO ORDERED.



March 1, 2022

Re: Chen, et al. v. Matsu Fusion Restaurant Inc., et al.
S.D.N.Y. Case No.: 19-CV-11895 (JMF)

Your Honor:

Our firm represents Defendants Matsu Fusion Restaurant Inc., Apex Japanese Restaurant Inc., Yi Chang (“Gary”) Chen, and Hiu Yin (“Wendy”) Lam (the “Matsu Defendants”).

In compliance with the February 28, 2022 summary judgment motion deadline, I filed a summary judgment motion on behalf of Defendant Hiu Yin (“Wendy”) Lam and supporting papers, including my own declaration, declarations of the two individual Matsu Defendants, and a memorandum of law to the ECF docket. However, due to an unfortunate good-faith oversight, I neglected to file Defendant Wendy Lam’s Local Rule 56.1 Statement with the other motion papers. I immediately submitted the Local Rule 56.1 Statement at 12:45am on March 1, 2022 after realizing my error. ECF No. 171. In view of the brevity of the delay, my immediate action to correct the omission, the timely filing of Defendant Wendy Lam’s other moving papers and as this was a genuine good-faith mistake on my part, I respectfully request that Your Honor accept the Local Rule 56.1 Statement despite the inadvertent 45-minute delay in filing the same, or retroactively grant an extension of the deadline by 45 minutes.

I apologize sincerely to Your Honor for this oversight and for any inconvenience I may have caused the Court. Thank you for considering this application.

Respectfully Submitted,
KAUFMAN DOLOWICH & VOLUCK, LLP

By: _____
Taimur Alamgir

cc: All Counsel (via e-mail)